

# **Exhibit 3**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NEWPORT NEWS DIVISION**

LLT MANAGEMENT LLC,

Plaintiff,

v.

Civil Action No. 4:24-cv-75

DR. THERESA SWAIN EMORY, DR.  
RICHARD LAWRENCE KRADIN, AND  
DR. JOHN COULTER MADDOX

Defendants.

**DECLARATION OF DR. RICHARD L. KRADIN, MD**

Dr. Richard L. Kradin, MD hereby declares under penalty of perjury as follows:

1. I am over eighteen (18) years of age and have personal knowledge of, and am competent to testify to, the matters set forth in this Declaration.
2. I am an Honorary Pathologist and Honorary Associate Physician at Massachusetts General Hospital and am board-certified in Internal Medicine, Anatomic Pathology, and Pulmonary Medicine. I took honorary status following my retirement from the practice of medicine in 2020.
3. In addition, I am an Associate Professor Emeritus of Medicine and Pathology at Harvard Medical School and a Consulting Pathologist and Pulmonologist at Hadassah Hospital Jerusalem, IL. I took Emeritus status following my retirement from Harvard Medical School in 2020.
4. Over my career, I have published more than 140 articles, 14 books or textbooks, and more than 30 additional reviews, chapters, and editorials. These scholarly publications relate to a range of issues, including immunotherapy and pulmonary diseases, among other topics.
5. I am licensed to practice medicine in the states of Massachusetts and Florida.

6. Before I retired in 2020, I practiced as a physician for more than 40 years. Throughout my career, my primary professional responsibilities related to patient care, training and supervising physicians in clinical settings, and academic research and scholarship.

7. I have also provided medical-legal consultation services where I have served as an expert witness in asbestos-related litigation and medical malpractice cases. This has never accounted for the majority of my professional work responsibilities. And since retiring, I provide these services on a part-time basis.

8. I co-authored a peer-reviewed article entitled “Malignant mesothelioma following repeated exposures to cosmetic talc: A case series of 75 patients,” which was subsequently published in March 2020 in the American Journal of Industrial Medicine (the “Article”).

9. My sole aim in conducting the study and writing and publishing the Article was to contribute to the scientific literature and advance patient care, just as I have done with respect to my many other academic and scientific publications. I did not receive any compensation for researching and writing the Article. I did not write the Article in order to further my expert witness services or to make money, and would never publish an article like this for any purpose other than advancing medicine or patient care.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 18, 2025.

A handwritten signature in black ink, appearing to read 'R. Kradin', written over a horizontal line.

Dr. Richard L. Kradin, M.D.